

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**CHRISTINE BORDEN,**

**Plaintiff,**

**v.**

**BANK OF AMERICA, NA (“BANA”) AND  
WESTCLIFF TECHNOLOGIES, INC.,  
D/B/A NATIONAL BITCOIN ATM, AND  
CASH CLOUD, INC., D/B/A/ COIN  
CLOUD,**

**Defendants.**

**CASE NO.: 2:22-cv-04076-BHH**

Removed from Georgetown County Court  
of Common Pleas  
Case No. 2022-CP-22-00868

**LOCAL RULE 26.01 INTERROGATORIES**

Defendant Bank of America, N.A. (hereinafter “BANA”), pursuant to the Local Rules of the United States District Court for the District of South Carolina, responds as follows to Local Rule 26.01 Interrogatories:

**(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

**ANSWER:** BANA is not aware of any person or legal entity with a subrogation interest in this action.

**(B) As to each claim, state whether it should be tried jury or non-jury and why.**

**ANSWER:** This case should be tried as non-jury as Plaintiff has not demanded a jury trial in the Complaint and Plaintiff has waived the right to trial by jury by contract.

**(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent.**

**ANSWER:** Defendant BANA is a direct, wholly owned subsidiary of BAC North America Holding Company. BAC North America Holding Company is a direct, wholly owned

subsidiary of NB Holdings Corporation. NB Holdings Corporation is a direct, wholly owned subsidiary of Bank of America Corporation. Bank of America Corporation is a publicly held company whose shares are traded on the New York Stock Exchange and has no parent corporation. Based on the U.S. Securities and Exchange Commission Rules regarding beneficial ownership, Berkshire Hathaway Inc., 3555 Farnam Street, Omaha, Nebraska 68131, beneficially owns greater than 10% of Bank of America Corporation's outstanding common stock.

**(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

**ANSWER:** As alleged by Plaintiff, the alleged events giving rise to the Complaint occurred in and around Charleston County, South Carolina.

**(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.**

**ANSWER:** Defendant is not aware of any cases related to this action.

**(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

**ANSWER:** Not applicable.

**(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or to the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

**ANSWER:** Plaintiff should pursue her claims against the people who took her money without authorization: Valerie Key Turner and/or Albert Winters.

This 16th day of November, 2022.

/s/ Jasmine K. Gardner

Jasmine K. Gardner (S.C. Fed. Bar #12531)  
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*Attorney for Defendant Bank of America,  
N.A.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 16, 2022, a true and correct copy of the foregoing was served via the Court's ECF filing system, as follows:

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/s/ Jasmine K. Gardner  
Jasmine K. Gardner